

# **Exhibit 4**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>J.G.,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	<b>CIVIL ACTION FILE</b>
<b>vs.</b>	:	
	:	<b>NO. 1:20-cv-05233-SEG</b>
<b>NORTHBROOK INDUSTRIES, INC., D/B/A UNITED INN AND SUITES,</b>	:	
	:	
<b>Defendant.</b>	:	

---

**PLAINTIFF’S RESPONSES TO DEFENDANT NORTHBROOK  
INDUSTRIES, INC., d/b/a UNITED INN AND SUITES’ SECOND  
REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

COMES NOW, J.G., Plaintiff in the above-styled case, by and through the undersigned counsel and serves this, Plaintiff J.G.’s Responses to Defendant Northbrook Industries, Inc., d/b/a United Inn and Suites’ (“UI&S”) Second Request for Production of Documents to Plaintiff and responds as follows:

**PLAINTIFF’S RESPONSES TO DEFENDANT’S SECOND REQUEST FOR  
PRODUCTION OF DOCUMENTS**

1. Please produce the pleadings in all legal actions in which Plaintiff J.G. has brought claims of any kind against any person or entity arising out of or relating to her being sex trafficked at any location by any person.

**RESPONSE:** Plaintiff refers Defendant to the publicly available pleadings in Case No. 1:21-cv-01344-VMC in the U.S. District Court for the Northern District of Georgia. The answer to this Interrogatory may be determined at least in part by reviewing the same documents and the burden of deriving or ascertaining the answer will be substantially the same for either party. Fed. R. Civ. P. 33(d).

2. Please produce all settlement agreements arising out of or relating to Plaintiff J.G.'s claims that she was sex trafficked at any location by any person.

**RESPONSE:** Plaintiff objects on the basis that the settlement agreement in Case No. 1:21-cv-01344-VMC is a binding and enforceable confidential contract, and under its binding terms it shall not be disclosed to any third parties, including Defendant.

Respectfully submitted this 16th day of March, 2023.

/s/ David H. Bouchard  
Richard W. Hendrix  
rhendrix@finchmccranie.com  
Georgia Bar No. 346750  
David H. Bouchard  
david@finchmccranie.com  
Georgia Bar No. 712859

FINCH McCRANIE, LLP  
229 Peachtree Street NE  
Suite 2500  
Atlanta, Georgia 30303  
(404) 658-9070 – Telephone  
(404) 688-0649 – Facsimile

/s/ Patrick J. McDonough  
Patrick J. McDonough  
pmcdonough@atclawfirm.com  
Georgia Bar No. 489855  
Jonathan S. Tonge  
jtonge@atclawfirm.com  
Georgia Bar No. 303999

ANDERSON, TATE & CARR, P.C.  
One Sugarloaf Centre  
1960 Satellite Boulevard, Suite 4000  
Duluth, Georgia 30097  
(770) 822-0900 – Telephone  
(770) 822-9680 – Facsimile

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on today's date I electronically served the foregoing document, **PLAINTIFF'S RESPONSES TO DEFENDANT NORTHBROOK INDUSTRIES, INC., d/b/a UNITED INN AND SUITES' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**, to the following counsel of record via email based on the parties' prior agreement to accept service of written discovery via email:

**Attorney for Defendant Northbrook Industries, Inc.,  
d/b/a United Inn & Suites**

Dana M. Richens  
Smith, Gambrell & Russell, LLP  
1105 W. Peachtree St. N.E., Suite 1000  
Atlanta, Georgia 30309

Dated: This 16th day of March, 2023.

/s/ David H. Bouchard

Richard W. Hendrix  
rhendrix@finchmccranie.com  
Georgia Bar No. 346750  
David H. Bouchard  
david@finchmccranie.com  
Georgia Bar No. 712859

FINCH McCRANIE, LLP  
229 Peachtree Street NE  
Suite 2500  
Atlanta, Georgia 30303  
(404) 658-9070 – Telephone  
(404) 688-0649 – Facsimile

*Attorneys for Plaintiff*